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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,  
Plaintiff,

V.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

V.

MARC B. WOLPOW 1995 FAMILY TRUST,  
BARRY S. VOLPERT and R. BRADFORD MALT,  
in their capacities as Trustees of the Marc B. Wolpow  
1995 Family Trust, MARC B. WOLPOW  
individually, and NINA WOLPOW,

## Defendants.

x

Adv. Pro. No. 08-01789 (SMB)

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## SIPA Liquidation

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(Substantively Consolidated)

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X

Adv. Pro. No. 10-04646 (SMB)

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X

**NOTICE OF APPEARANCE AND DEMAND  
FOR SERVICE OF PLEADINGS AND OTHER PAPERS**

PLEASE TAKE NOTICE THAT Frejka PLLC hereby files this notice of appearance in adversary proceeding number 10-04646 (SMB) (the “Adversary Proceeding”) on behalf of Marc B. Wolpow 1995 Family Trust, Barry S. Volpert, in his capacity as Trustee of the Wolpow Trust, R. Bradford Malt, in his capacity as Trustee of the Wolpow Trust, Marc B. Wolpow, and Nina Wolpow (the “Defendant”) as co-counsel with Kramer Levin Naftalis & Frankel LLP.

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Frejka PLLC requests that copies of all notices and pleadings given or served in the Adversary Proceeding be given and served upon Frejka PLLC at the office, address, telephone number, and e-mail addresses set forth below:

FREJKA PLLC  
733 Third Avenue  
New York, New York 10017  
Attn: Elise S. Frejka  
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes all of the notices and papers referred to in the Bankruptcy Rules, Bankruptcy Code, and the Local Bankruptcy Rules for the Southern District of New York, and also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to the Adversary Proceeding and any proceedings therein, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex or otherwise, all of which shall be sent to the attorneys listed above.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Pleadings and Other Papers, nor any later appearance, pleading, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a judge of the United States District Court for the Southern District of New York, (ii) the right to trial by jury in any proceeding related to the Adversary Proceeding, or proceeding related to the Adversary Proceeding, (iii) the right to have the United States District Court for the Southern District of New York withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this notice, (v) an election of remedy, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York  
March 25, 2015

FREJKA PLLC

By: /s/ Elise S. Frejka  
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